BEFORE THE

PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of Airadigm Communications, Inc., for Designation as an Eligible Telecommunications Carrier

7989-TI-105

FINAL DECISION

This is the final decision in this proceeding to determine whether to designate Airadigm Communications, Inc. (Airadigm), as an Eligible Telecommunications Carrier (ETC), pursuant to 47 U.S.C. § 214(e)(2) and Wis. Admin. Code § PSC 160.13. Designation as an ETC makes a provider eligible to receive universal service fund (USF) monies.

Introduction

Airadigm filed an application for ETC designation on November 28, 2003. The Commission issued a Notice of Investigation on December 19, 2003. That Notice requested comments, to be filed on or before January 15, 2004. CenturyTel and TDS Metrocom filed comments. The Commission discussed this matter at its March 11, 2004, open meeting. A list of parties interested in this proceeding may be found in Appendix A.

Airadigm requested ETC designation for the exchanges shown in Appendix B. The territories for which ETC designation is requested are served by a mix of rural and non-rural telecommunications carriers.

Findings of Fact

1. The wireless industry, its customary practices, its usual customer base, and Airadigm's desire not to obtain state USF money create an unusual situation.

- 2. It is reasonable to adopt different ETC eligibility requirements and obligations for Airadigm than specified by Wis. Admin. Code § PSC 160.13.
- 3. It is reasonable to require Airadigm to meet only the federal requirements for ETC status in order to be eligible for ETC designation.
- 4. It is reasonable to relieve Airadigm from ETC obligations other than those imposed under federal law.
- 5. It is reasonable to require that Airadigm not apply for state USF funds and that if it ever does, all state requirements for and obligations of ETC status shall again be applicable to it.
 - 6. Airadigm meets the federal requirements for ETC designation.
- 7. It is in the public interest to designate Airadigm as an ETC in certain areas served by rural telephone companies.
- 8. It is reasonable to grant Airadigm ETC status in the non-rural wire centers indicated in its application, to the extent that the wire centers are located within the state.
- 9. It is reasonable to grant Airadigm ETC status in the rural service territories indicated in its application, to the extent such areas are located within the state.

Conclusions of Law

- 1. The Commission has jurisdiction and authority under Wis. Stat. §§ 196.02, and 196.218; Wis. Admin. Code ch. PSC 160; 47 U.S.C. §§ 214 and 254; and other pertinent provisions of the Telecommunications Act of 1996, to make the above Findings of Fact and to issue this Order.
- 2. The law does not require the Commission to conduct a hearing in this docket, as requested by CenturyTel and TDS Telecom.

- 3. Neither federal law nor state law create a substantial, or property, interest in exclusive ETC status for incumbent rural ETCs.
- 4. Even if "notice and opportunity for hearing" as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to the current ETCs in the rural areas at issue on any other basis, the Notice Requesting Comments, dated September 12, 2003, satisfies this requirement.

Opinion

On December 20, 2002, the Commission granted the U.S. Cellular ETC status as applied for in Docket No. 8225-TI-102. *Application of United States Cellular Corporation for Designation as an Eligible Telecommunications Carrier in Wisconsin*, Docket No. 8225-TI-102, 2002 WL 32081608, (Wisconsin Public Service Commission, December 20, 2002). The instant application is substantively similar to the application of U.S. Cellular. The Commission reaffirms its decision in Docket No. 8225-TI-102 and relies on the opinion issued in the Final Decision in that docket, to approve Airadigm's application.

ETC status was created by the FCC, and codified in 47 U.S.C. § 214(e)(2). Under FCC rules, the state commissions are required to designate providers as ETCs. 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(b). Designation as an ETC is required if a provider is to receive federal universal service funding. ETC designation is also required to receive funding from some, but not all, state universal service programs.

The FCC established a set of minimum criteria that all ETCs must meet. These are codified in the federal rules. 47 U.S.C. § 214(e)(1), 47 C.F.R. § 54.101(a). The 1996 Telecommunications Act states that: "States may adopt regulations not inconsistent with the

Commission's rules to preserve and advance universal service." 47 U.S.C. § 254(f). A court upheld the states' right to impose additional conditions on ETCs in *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 418 (5th Cir. 1999). While states must designate multiple ETCs if more than one provider meets the requirements and requests that status in a non-rural area, it must determine that it is in the public interest before designating more than one ETC in a rural area. 47 C.F.R. § 54.201. The Commission has already designated one ETC in each rural area.

In the year 2000, the Commission promulgated rules covering ETC designations and requirements in Wisconsin. Wis. Admin. Code § PSC 160.13. Those rules govern the process for ETC designation and set forth a minimum set of requirements for providers seeking ETC designation from the Commission. The application filed by Airadigm asks that it be designated as an ETC for federal purposes only. It states that it is not seeking designation as an ETC for state purposes and, therefore, is not required to meet the additional state requirements.

States must examine the federal requirements, but are allowed to create additional requirements. Wisconsin has done so. The Commission's requirements for ETC designation clarify and expand upon the more basic FCC rules. There is no provision in the rule for designation as an ETC for federal purposes only. If a provider seeks to be designated as an ETC, it must follow the procedures and requirements in Wis. Admin. Code § PSC 160.13 and, if such a designation is granted, that designation serves to qualify the provider for both state and federal universal service funding. However, Wis. Admin. Code § PSC 160.01(2)(b) provides that:

Nothing in this chapter shall preclude special and individual consideration being given to exceptional or unusual situations and upon due investigation of the facts and circumstances involved, the adoption of requirements as to individual providers or services that may be lesser, greater, other or different than those provided in this chapter.

Airadigm's request for ETC status presents an unusual situation. The wireless industry, its customary practices, and its usual customer base are quite different than those of wireline companies. Additionally, Airadigm has stated that it has no desire to obtain state USF money. The Commission finds that under the particular circumstances of this case, it is reasonable to adopt different ETC requirements for Airadigm to meet, and to grant ETC status to Airadigm with certain limitations.

Because Airadigm only wishes to obtain federal USF support, the Commission shall adopt the federal requirements for ETC status as the requirements that Airadigm must meet to obtain ETC status. The federal requirements are found in 47 U.S.C. § 214(e)(1) and 47 C.F.R. §§ 54.101(a), 54.405 and 54.411. Further, the Commission relieves Airadigm from ETC obligations other than those imposed under federal law. However, since Airadigm will not be subject to the state requirements and state obligations, the Commission requires that Airadigm not apply for state USF money. If Airadigm ever does apply for state USF money, then all of the state requirements for and obligations of ETC status shall again be applicable to Airadigm.

The Commission finds that Airadigm has met the requirements for ETC designation; it will offer supported service to all customers in its designation areas and will advertise these services. In the FCC Declaratory Ruling *In the Matter of Federal-State Joint Board on Universal Service, Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, FCC 00-248 (released 8/10/00), par. 24 (South Dakota Decision) the FCC has stated:

A new entrant can make a reasonable demonstration to the state commission of its capability and commitment to provide universal service without the actual provision of the proposed service. There are several possible methods for doing so, including, but not limited to: (1) a description of the proposed service technology, as supported by appropriate submissions; (2) a demonstration of the extent to which the carrier may otherwise be providing telecommunications services within the state; (3) a description of the extent to which the carrier has entered into interconnection and resale agreements; or, (4) a sworn affidavit signed by a representative of the carrier to ensure compliance with the obligation to offer and advertise the supported services.

If this is sufficient for a new entrant, it would seem to be even more so for someone who has already started to serve portions of the exchanges. Airadigm submitted an affidavit ensuring compliance and, as mentioned earlier, is not only providing service in other areas of the state but also in parts of the areas for which it has requested ETC status.

The Commission finds that Airadigm meets the requirement to offer service to all requesting customers. It has stated in its application and comments that it will do so. In the comments it is argued that the applicant will not provide service to all customers in the indicated exchanges and thus, because of the issue of "cellular shadows," the applicant will not meet the same standard that is applied to wireline providers. However, this is a case where "the devil is in the details." It is true that the purpose of universal service programs is to ensure that customers who might not otherwise be served at affordable rates by a competitive market still receive service. However, like for wireline companies, access to high cost assistance is what helps ensure that service is provided. For Airadigm, access to high cost assistance is exactly what will make expanding service to customers requesting service in the areas for which it is designated as an ETC "commercially reasonable" or "economically feasible." As the FCC has said:

A new entrant, once designated as an ETC, is required, as the incumbent is required, to extend its network to serve new customers upon reasonable request. South Dakota Decision, par. 17.

Airadigm, like wireline ETCs, must fulfill this mandate, and access to high cost funding is what will help make doing so possible. The issue of "dead spots" is not significantly different from a wireline ETC that does not have its own lines in a portion of an exchange, perhaps a newly developed area. After obtaining a reasonable request for service, the wireline is required to find a way to offer service, either through extending its own facilities or other options. So too, Airadigm must be given a reasonable opportunity to provide service to requesting customers, whether through expansion of its own facilities or some other method.

Airadigm has also stated in its affidavit, application, and comments that it will advertise the designated services as required under 47 U.S.C. § 214(e)(1)(B), including the availability of low income programs.

Other objections to Airadigm's designation focus on an alleged inability to meet certain additional state requirements in Wis. Admin. Code § PSC 160.13. These are moot, however, since the Commission has adopted different requirements for Airadigm.

Some of the exchanges for which Airadigm seeks ETC status are served by non-rural ILECs (SBC or Verizon); a list is shown in Appendix B. Under Wis. Admin. Code § PSC 160.13(3) and 47 U.S.C. § 251(e)(2), the Commission must designate multiple ETCs in areas served by such non-rural companies. However, the Commission may only designate multiple ETCs in an area served by a rural company if designating more than one ETC is in the public interest. Some of the exchanges for which Airadigm seeks ETC status are served by rural telephone companies.

The Commission finds that designating Airadigm as an additional ETC in these areas is in the public interest. In its determination, the Commission is guided by the Wis. Stat.

§ 196.03(6) factors to consider when making a public interest determination:

- (a) Promotion and preservation of competition consistent with ch. 133 and s. 196.219.
- (b) Promotion of consumer choice.
- (c) Impact on the quality of life for the public, including privacy considerations.
- (d) Promotion of universal service.
- (e) Promotion of economic development, including telecommunications infrastructure deployment.
- (f) Promotion of efficiency and productivity.
- (g) Promotion of telecommunications services in geographical areas with diverse income or racial populations.

The Commission finds that designating Airadigm as an ETC in areas served by rural companies will increase competition in those areas and, so, will increase consumer choice. While it is true that Airadigm is currently serving in at least some of these areas, the availability of high cost support for infrastructure deployment will allow Airadigm to expand its availability in these areas. Further, designation of another ETC may spur ILEC infrastructure deployment and encourage further efficiencies and productivity gains. Additional infrastructure deployment, additional consumer choices, the effects of competition, the provision of new technologies, a mobility option and increased local calling areas will benefit consumers and improve the quality of life for affected citizens of Wisconsin. As a result, the Commission finds that it is in the public interest to designate Airadigm as an ETC in the areas served by rural telephone companies for which it has requested such designation. ¹

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¹ Eighteen other state commissions and the FCC have approved wireless ETC applications as second ETCs in rural areas on similar grounds.

The areas for which Airadigm is granted ETC status vary. Wis. Admin. Code
§ PSC 160.13(2) states that the areas in which a provider shall be designated as an ETC depend
on the nature of the ILEC serving that area. If the ILEC is a non-rural telephone company, the
designation area is the ILEC's wire center. The FCC has urged states not to require that
competitive ETCs be required to offer service in the entire territory of large ILECs. It has found
that such a requirement could be a barrier to entry. *Report and Order in the Matter of Federal- State Joint Board on Universal Service*, FCC 97-157 (released 5/8/97) pars. 176-177 (First
Report and Order). Wisconsin's rule provision resolves this federal concern. As a result,
Airadigm is granted ETC status in the SBC and Verizon wire centers for which it requested such
status, to the extent that such wire centers are located within the state.

Wis. Admin. Code § PSC 160.13(2) provides that if the ILEC is a rural telephone company, the ETC designation area is different. For an area served by a rural telephone company, the designation area is generally the entire territory (study area) of that rural company. A smaller designation area is prohibited unless the Commission designates and the FCC approves a smaller area. 47 C.F.R. § 54.207(b). Airadigm's application contained a list of rural telephone company areas for which it requested ETC status. This list is shown in Appendix B. Airadigm is asking for designation in the entire study areas of the rural companies at issue.

The Commission also grants ETC status to Airadigm in the rural company study for which it requested such status, to the extent that such exchanges are located within the state.

Requests for Hearing

In accordance with the Notice Requesting Comments, dated December 19, 2003, the Commission received a joint filing from two companies, which requested, on various grounds, the Commission conduct a contested case hearing before deliberation of the application.

CenturyTel, Inc., and TDS Telecom Corporation claimed a right to a hearing under

Wis. Admin. Code § PSC 160.13(3) and Wis. Stat. § 227.42. The law, however, does not require the Commission conduct a hearing in this docket as requested. Furthermore, even if "notice and opportunity for hearing" as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to the current ETCs in the rural areas at issue on any other basis, the Notice Requesting Comments, dated December 19, 2003, satisfies this requirement.

CenturyTel, Inc., and TDS Telecom Corporation claimed a right to a hearing under Wis. Admin. Code § PSC 160.13(3) and Wis. Stat. § 227.42.

Wis. Admin. Code § PSC 160.13 (3) states:

For an area served by an incumbent local exchange service provider that is a rural telephone company, the commission may only designate an additional eligible telecommunications carrier after finding that the public interest requires multiple eligible telecommunications carriers, pursuant to federal law and s. 196.50 (2), Stats. For an area served by an incumbent local exchange service provider that is not a rural telephone company, the commission may designate an additional eligible telecommunications carrier without making such a finding.

Wis. Stat. § 196.50(2), designates the process to certify a telecommunications utility.

Wis. Stat. § 196.50(2), states in part, "... after notice and opportunity for hearing, that the applicant possesses sufficient technical, financial and managerial resources to provide telecommunications service to any person within the identified geographic area." According to

the rule and statute it would appear that notice and opportunity for hearing is a required procedure in the instant case.

Wis. Stat. § 196.50(2), however, does not apply to an application for ETC status of a wireless company to be an additional ETC in a rural area. Wis. Stat. § 196.202,² expressly restricts Commission jurisdiction over wireless providers. This statute prevents the Commission from applying almost every provision of Wis. Stat. ch. 196, to wireless providers, except for Wis. Stat. § 196.218(3).³ This section only applies if, "the commission promulgates rules that designate [cellular] providers as eligible to receive universal service funding under both the federal and state universal service fund programs." Wis. Stat. § 196.218(3), mandates telecommunications providers contribute to the Wisconsin Universal Service Fund (WUSF). (Wireless providers currently have been exempted.) This section, however, is wholly unrelated

Exemption of commercial mobile radio service providers. (2) Scope of regulation.

A commercial mobile radio service provider is not subject to <u>ch. 201</u> or this chapter, except as provided in <u>sub. (5)</u>, and except that a commercial mobile radio service provider is subject to <u>s. 196.218 (3)</u> if the commission promulgates rules that designate commercial mobile radio service providers as eligible to receive universal service funding under both the federal and state universal service fund programs. If the commission promulgates such rules, a commercial mobile radio service provider shall respond, subject to the protection of the commercial mobile radio service provider's competitive information, to all reasonable requests for information about its operations in this state from the commission necessary to administer the universal service fund. (5) Billing. A commercial mobile radio service provider may not charge a customer for an incomplete call.

Contributions to the fund. (a) 1. Except as provided in <u>par. (b)</u>, the commission shall require all telecommunications providers to contribute to the universal service fund beginning on January 1, 1996. determined by the commission under <u>par. (a) 4.</u>

² Wis. Stat. § 196.202, states:

³ Wis. Stat. § 196.218 (3), states, in part:

to the requirements for eligibility to receive money from the WUSF and, otherwise, unrelated to this case.⁴

The Commission cannot apply Wis. Stat. § 196.50(2), to wireless providers. The Commission, therefore, cannot proceed under Wis. Stat. § 196.50(2)(f), when evaluating the ETC application of a wireless provider. As a matter of law, the reference to Wis. Stat. § 196.50(2)(b)(f), in Wis. Admin. Code § PSC 160.13, cannot apply to ETC applications of wireless providers, including Airadigm.

Wis. Stat. § 227.42 provides a right to a hearing, treated as a contested case, to any person filing a written request for a hearing with an agency who meets the following four part test:

- (a) A substantial interest of the person is injured in fact or threatened with injury by agency action or inaction;
- (b) There is no evidence of legislative intent that the interest is not to be protected;
- (c) The injury to the person requesting a hearing is different in kind or degree from injury to the public caused by the agency action or inaction; and
- (d) There is a dispute of material fact.

CenturyTel, Inc., and TDS Telecom Corporation own local exchange telephone companies that provide essential telecommunications service as ETCs in the rural areas at issue. These companies are competitors of Airadigm. On this basis, these companies claim they have a substantial interest protected by law, and will suffer special injury based on the ETC designation of Airadigm. Federal law and state law, however, do not

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⁴ Like the Legislature, Congress has also limited the state role in regulating on wireless carriers. 47 U.S.C. § 332(c)(3); *Bastien v. AT&T Wireless Services, Inc.*, 205 F.3d 983 (7th Cir. 2000).

ETCs. Alenco Communications v. FCC, 201 F.3d 608 (2000) ("The purpose of universal service is to benefit the customer, not the carrier."); WITA v. WUTA, 65 P.3d 319 (2003); "In re Application of GCC License Corp., 647 N.W.2d 45, 52, 264 Neb. 167, 177 (2002)." ("[r]ather, customers' interest, not competitors', should control agencies' decisions affecting universal service" and that "[t]he Telecommunications Act does not mention protecting the private interests of incumbent rural carriers, who are often exclusive ETCs simply by default as the sole service provider operating in a particular area.") See also, State ex rel. 1st Nat. Bank v. M&I Peoples Bank, 95 Wis. 2d 303, 311 (1980). (Economic injury as the result of lawful competition does not confer standing.); MCI Telecommunications v. Pub. Serv. Comm., 164 Wis. 2d 489, 496, 476 N.W.2d 575 (Ct. App. 1991); and Wisconsin Power & Light v. PSC, 45 Wis. 2d 253 (1969) ("... the predominant purpose underlying the public utilities law is the protection of the consuming public rather than the competing utilities.")

In addition, these companies also claim that granting Airadigm ETC status will reduce the amount of USF funds available to the public. However, the companies' claim is entirely speculative. Further, as explained above, such result does not injure companies' protected interest. Finally, increasing the number of carriers eligible for federal USF money will increase the amount of federal USF dollars brought into Wisconsin. The federal USF provides a benefit to customers through the assistance of carriers who commit to providing service in high-cost areas. The designation of more than one ETC in a particular high-cost area allows more carriers providing service in

rural Wisconsin, such as Airadigm, to tap into money collected on a nation-wide basis so that more services and more provider choices can be afforded to these customers. As such, ETC designation, like the instant one, necessarily provides a benefit to customers.

The law does not require the Commission conduct a hearing in this docket. Even if "notice and opportunity for hearing" as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to the current ETCs in the rural areas at issue on any other basis, the Notice Requesting Comments, dated December 19, 2003, satisfies this requirement. *Waste Management of Wisconsin v. DNR*, 128 Wis. 2d 59, 78, 381 N.W.2d 318 (1985). (An appropriate "opportunity for hearing" may be exclusively through written comments.)

Order

- 1. Airadigm is granted ETC status in the non-rural wire centers indicated in its application; to the extent the wire centers are located within the state.
- 2. Airadigm is granted ETC status in the rural study areas for which it has requested such designation; to the extent the areas are located within the state.
- 3. Airadigm shall not apply for state USF support. If it ever does file for such support, the state eligibility requirements for, and obligations of, ETC status shall immediately apply to it.
- 4. Based on the affidavit of Kenneth R. Hoefle, President & COO, Airadigm is an ETC within the meaning of 47 U.S.C. § 214 (c) and is eligible to receive funding pursuant to 47 U.S.C. § 254 (2). This order constitutes the certification to this effect by the Commission.

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- 5. The requests for a contested case hearing by CenturyTel, Inc., and TDS Telecom Corp., are rejected.
 - 6. Jurisdiction is maintained.

Dated at Madison, Wisconsin,						
By the Commission:						
Lynda L. Dorr						

Lynda L. Dorr Secretary to the Commission

See attached Notice of Appeal Rights

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in Wis. Stat. § 227.53. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in Wis. Stat. § 227.01(3), a person aggrieved by the order has the further right to file one petition for rehearing as provided in Wis. Stat. § 227.49. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 9/28/98

APPENDIX A

This proceeding is not a contested case under Wis. Stat. ch. 227, therefore there are no parties to be listed or certified under Wis. Stat. § 227.47. However, the persons listed below participated.

Public Service Commission of Wisconsin (Not a party but must be served) 610 North Whitney Way P.O. Box 7854 Madison, WI 53707-7854

Bob Schulze, Senior Vice President Airadigm Communications P.O. Box 206 Little Chute, WI 54140

Mark A. Edwards Foley & Lardner Verex Plaza 150 East Gilman Street Madison, WI 53703-1481

NON-RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: SBC AMERITECH WISCONSIN

Wire Centers:

ALGOMA APPLETON BEAVER DAM BELOIT BURNETT

CHIPPEWA FALLS

COLUMBUS DE PERE DELAVAN EAU CLAIRE EVANSVILLE FOND DU LAC **GENOA CITY GREEN BAY HORICON HORTONVILLE JANESVILLE** JUNEAU

KAUKAUNA KEWAUNEE LAKE GENEVA LITTLE CHUTE **MADISON**

MANITOWOC **MAYVILLE** MENOMONIE

NEENAH

NEW LONDON OMRO OSHKOSH RICHMOND

SHEBOYGAN FALLS

SHEBOYGAN STEVENS POINT **STOUGHTON** STURGEON BAY VAN DYNE WAUPACA

WAUPUN WHITEWATER WILLIAMS BAY WINNECONNE WRIGHTSTOWN

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: AMHERST TELEPHONE CO.

Wire Centers: AMHERST

POLONIA ROSHOLT

LEC: BADGER TELECOM INC.

Wire Centers: CHILI

GRANTON GREENWOOD NEILLSVILLE

LEC: BAYLAND TELEPHONE INC.

Wire Center: ABRAMS

LEC: BELMONT TELEPHONE CO.

Wire Center: BELMONT

LEC: BERGEN TELEPHONE CO.

Wire Center: BERGEN

LEC: BLACK EARTH TELEPHONE CO.

Wire Center: BLACK EARTH

LEC: BLOOMER TELEPHONE CO.

Wire Center: BLOOMER

LEC: BONDUEL TELEPHONE CO.

Wire Center: BONDUEL

LEC: BURLINGTON, BRIGHTON & WHEATLAND TEL. CO.

Wire Center: BOHNERS LAKE

WHEATLAND

LEC: CENTRAL STATE TELEPHONE CO.

Wire Centers: AUBURNDALE

CRANMOOR
JUNCTION CITY
LINDSEY

MILL CREEK NECEDAH PITTSVILLE VESPER

LEC: CENTURYTEL OF MIDWEST - WI - CASCO

Wire Centers: CASCO

THORP

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: CENTURYTEL OF CENTRAL WILLC.

Wire Centers: ALMA CENTER

ARCADIA ARGYLE AUGUSTA BANGOR BENTON BLACK CREEK

BLAIR

BLACK RIVER FALLS

CENTERVILLE
CLEGHORN
DARLINGTON
DENMARK
ETTRICK
FAIRCHILD
FALL CREEK
FOUNTAIN CITY
GALESVILLE
GRATIOT
HIXTON
HOLMEN

HIXTON
HOLMEN
KINGSTON
LUXEMBURG
MARKESAN
MELROSE
MERRILLAN
MINDORO
MONTFORT
MUSCODA

MUSCODA NEW FRANKEN

NICHOLS OSSEO PICKETT ROSENDALE SEYMOUR SHIOCTON

SHULLSBURG TAYLOR

TREMPEALEAU WAUTOMA WHITEHALL

WIOTA

LEC: CENTURYTEL OF FAIRWATER-BARNDON-ALTO INC.

Wire Center: BRANDON

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: CENTURYTEL OF FORESTVILLE INC.

Wire Centers: BRUSSELS

FORESTVILLE LITTLE STURGEON

LEC: CENTURYTEL OF LARSEN-READFIELD INC.

Wire Centers: LARSEN

READFIELD

LEC: CENTURYTEL OF MIDWEST-WI INC. -PLATTEVILLE

Wire Centers: HAZELGREEN

PLATTEVILLE

LEC: CENTURYTEL OF MONROE COUNTY INC.

Wire Centers: CASHTON

CATARACT NORWALK ONTARIO SPARTA WILTON

LEC: CENTURYTEL OF NORTHERN WI INC.

Wire Centers: BOULDER JUNCTION

EAGLEPOINT GILMAN GLEASON HOLCOMBE JIM FALLS JUMP RIVER

MANITOWISH WATERS

PRESQUE ISLE

LEC: CENTURYTEL OF SOUTHERN WI INC.

Wire Centers: CAMBRIA

FALL RIVER FOX LAKE RANDOLPH

RIO

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: CENTURYTEL OF MIDWEST - KENDALL INC.

Wire Centers: BARABOO

BERLIN CORNELL GREEN LAKE KENDALL MARINETTE MAZOMANIE NORTH FREEDOM

OCONTO

OCONTO FALLS PESHTIGO PRINCETON RED GRANITE STANLEY

LEC: CENTURYTEL OF THE MIDWEST-WI INC- CENCOM

Wire Centers: AMBERG

COLEMAN
CRIVITZ
FREMONT
GOODMAN
HARMONY
LENA
MILTON
PEMBINE
POY SIPPI
TWINBRIDGE
WAUSAUKEE
WEYAUWEGA

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

WAYSIDE

LEC: CENTURYTEL OF THE MIDWEST-WI INC - WAYSIDE

Wire Centers: FOOTVILLE

AVOCA BOSCOBEL BOYD CADOTT DEFOREST EAST TROY ELROY **HIGHLAND** MOUNT ZION **NESHKORO POYNETTE RIPON STEUBEN** TOMAH **WARRENS** WILD ROSE

LEC: CENTURYTEL OF WILLC.

Wire Centers: LA CROSSE

WEST SALEM

WONEWOC

LEC: CHIBARDUN TELEPHONE COOPERATIVE INC.

Wire Centers: RIDGELAND

SAND CREEK

LEC: COCHRANE COOPERATIVE TELEPHONE CO.

Wire Centers: COCHRANE

WAUMANDEE

LEC: COON VALLEY FARMERS TELEPHONE CO.

Wire Centers: CHASEBURG

COON VALLEY STODDARD

LEC: DICKEYVILLE TELEPHONE CORP.

Wire Center: DICKEYVILLE

LEC: EASTCOAST TELECOM INC.

Wire Centers: CLEVELAND

COLLINS

HOWARDS GROVE

ST NAZIANZ

VALDERS APPENDIX B

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: FARMERS TELEPHONE CO.

Wire Centers: BEETOWN

CASSVILLE LANCASTER POTOSI

LEC: FRONTIER COMMUNICATIONS OF MONDOVI INC.

Wire Centers: MONDOVI

VIROQUA BEAR CREEK BOWLER CECIL

CLINTONVILLE GRESHAM KESHENA MARION NEOPIT SHAWANO TIGERTON

LEC: GRANTLAND TELECOM INC.

Wire Centers: BAGLEY

BLOOMINGTON FENNIMORE MOUNT HOPE WOODMAN

LEC: HILLSBORO TELEPHONE CO. INC.

Wire Center: HILLSBORO

LEC: LAVALLE TELEPHONE COOPERATIVE

Wire Center: LAVALLE

LEC: LAKEFIELD TELEPHONE CO.

Wire Centers: NEWTON

NEWTONBURG

LEC: LEMONWEIR VALLEY TELEPHONE CO.

Wire Centers: CAMP DOUGLAS

NEW LISBON

LEC: MANAWA TELEPHONE CO. INC.

Wire Centers: MANAWA

OGDENSBURG

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: MARQUETTE - ADAMS TELEPHONE COOPERATIVE INC.

Wire Centers: BROOKS

ENDEAVOR OXFORD PACKWAUKEE

LEC: MID-PLAINS TELEPHONE INC.

Wire Centers: CROSS PLAINS

MIDDLETON

LEC: MIDWAY TELEPHONE CO. - WI

Wire Centers: DORCHESTER

MEDFORD STETSONVILLE

LEC: MOSINEE TELEPHONE CO.

Wire Center: MOSINEE

LEC: MT. HOREB TELEPHONE CO.

Wire Center: MOUNT HOREB

LEC: MT. VERNON TELEPHONE CO.

Wire Centers: MT VERNON

NEW GLARUS VERONA

LEC: NELSON TELEPHONE COOPERATIVE

Wire Centers: ARKANSAW

DURAND GILMANTON NELSON

LEC: NIAGARA TELEPHONE CO.

Wire Center: NIAGARA

LEC: NORTHEAST TELEPHONE CO.

Wire Centers: KRAKOW

MILL CENTER ONEIDA PULASKI

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: RHINELANDER TEL – HEADWATERS (DBA FRONTIER RIB LAKE)

Wire Centers: ARGONNE

CRANDON

CRESCENT LAKE

ELCHO

LAKE TOMAHAWK PELICAN LAKE RHINELANDER RIB LAKE SUGAR CAMP

LEC: RICHLAND - GRANT TELEPHONE COOPERATIVE INC.

Wire Centers: BLUE RIVER

BOAZ

GAYS MILLS

SABIN

SOLDIERS GROVE

LEC: RIVERSIDE TELCOM INC.

Wire Center: REESEVILLE

LEC: SCANDINAVIA TELEPHONE CO.

Wire Centers: IOLA

SCANDINVIA

LEC: SHARON TELEPHONE CO. - WISCONSIN

Wire Center: SHARON

LEC: STATE LONG DISTANCE TELEPHONE CO.

Wire Center: ELKHORN

LEC: STOCKBRIDGE & SHERWOOD TELEPHONE CO.

Wire Centers: SHERWOOD

STOCKBRIDGE TISCH MILLS

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: TELEPHONE USA OF WILLC.

Wire Centers: BOYCEVILLE

COLFAX
EASTMAN
ELK MOUND
GILLETT
KNAPP
LAKEWOOD
LAONA
PEPIN

PRARIE DU CHIEN

SENECA SURING WABENO WAUZEKA WHEELER

LEC: TENNEY TELEPHONE CO.

Wire Center: ALMA

LEC: TRI - COUNTY TELEPHONE COOPERATIVE INC.

Wire Centers: ELEVA

INDEPENDENCE NORTHFIELD PIGEON FALLS PLEASANTVILLE

STRUM

LEC: UNION TELEPHONE CO. - WI

Wire Centers: ALMOND

COLOMA HANCOCK PLAINFIELD

LEC: UTELCO INC.

Wire Centers: ALBANY

BROWNTOWN

JUDA MONROE MONTICELLO SOUTH WAYNE WOODFORD

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: VERIZON NORTH INC.-WI

Wire Centers: ADAMS

ANTIGO ARENA ATHENS

BAILEYS HARBOR BELLEVILLE BLOOM CITY

BRIGGSVILLE BRILLION BRODHEAD BROOKLYN

CAMBRIDGE CAMPBELLSPORT

CASCADE CEDAR GROVE CHILTON

CLINTON CLYMAN COBB

COTTAGE GROVE

DARIEN DEERFIELD DODGEVILLE EAGLE RIVER

EAGLE RIVER
EDEN
EDGAR
EDGERTON
EGG HARBOR
ELKHART LAKE
GREENBUSH
HATLEY
HILBERT

HOLLANDALE HUSTISFORD

ITHACA JACKSONPORT

JOHNSBURG

KIEL

LAND O LAKES LAC DU FLAMBEAU

LEBANON LIME RIDGE

LODI

LOGANVILLE

LOMIRA

LONE ROCK APPENDIX B

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: VERIZON NORTH INC.-WI (continued)

Wire Centers: LOYAL

LYNDON STATION

MARATHON
MARSHALL
MARSHFIELD
MATTOON
MAUSTON
MCFARLAND
MERRILL
MERRIMAC
MINERAL POINT
MINOCQUA
MISHICOT

MONROE CENTER

MONTELLO MT CALVARY NEOSHO

NEOSHO NEW HOLSTEN OAKFIELD OOSTBURG OREGON ORFORDVILLE

OWEN

PARDEEVILLE

PHELPS PLAIN PLYMOUTH PORTAGE

RANDOM LAKE REEDSBURG REEDSVILLE

RICHFIELD CENTER

RIDGEWAY SAUK CITY SAYNER SISTER BAY SPENCER SPRING GREEN

ST CLOUD STRATFORD SUN PRAIRIE

THERESA THREE LAKES TOMAHAWK

TWO RIVERS

RURAL WIRE CENTERS FOR IMMEDIATE DESIGNATION

LEC: VERIZON NORTH INC.-WI (continued)

Wire Centers: WALWORTH

WASHINGTON ISLAND

WAUSAU WESTFIELD WHITE LAKE WHITELAW

WISCONSIN DELLS

WITWEN

LEC: VERNON TELEPHONE COOPERATIVE

Wire Centers: GENOA

LA FARGE LIBERTY POLE READSTOWN

VIOLA WESTBY YUBA

LEC: WAUNAKEE TELEPHONE CO.

Wire Center: WAUNAKEE

LEC: WEST WISCONSIN TELCOM COOPERATIVE INC.

Wire Centers: DOWNSVILLE

EAU GALLE ELK LAKE ROCK FALLS SPRINGLAKE

LEC: WITTENBERG TELEPHONE CO.

Wire Centers: ELDERON

WITTENBERG

LEC: WOOD COUNTY TELEPHONE CO.

Wire Centers: NEKOOSA

PORT EDWARDS

RUDOLPH

WISCONSIN RAPIDS